

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA )  
                               )  
                               )  
v.                           )    Crim. No. 2:18-cr-45  
                               )  
                               )  
MARK RUSSELL (a.k.a. "Snake"), )  
                               Defendant. )

**GOVERNMENT'S MOTION FOR DETENTION**

The United States moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

**1. Eligibility for Detention.**

This defendant is eligible for detention because the case involves an offense under 21 U.S.C. § 856(a), which is a Controlled Substances Act offense for which the maximum term of imprisonment is twenty years and is thus eligible for detention pursuant to 18 U.S.C. § 3142(f)(1)(C).

**2. Reason For Detention.**

The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of the community. The defendant has a significant criminal record and a serious drug addiction.

3. Rebuttable Presumption.

The United States invokes the rebuttable presumption against the defendant under 18 U.S.C. § 3142(e)(3).

4. Time For Detention Hearing.

The United States requests a continuance until Monday, April 30, 2018, pursuant to 18 U.S.C. § 3142(f). Among other reasons, this continuance will give the Probation Office an adequate amount of time to complete its investigation regarding whether to recommend pre-trial release.

Dated at Burlington, in the District of Vermont, April 27, 2018.

Respectfully submitted,

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN  
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